

United States Courts
Southern District of Texas
FILED

FEB 28 2019

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

V.

JULIA ANN POFF
WILLIAM HARVEY POFF

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§

CRIMINAL NO.

H-17-CR-669-S2

SECOND SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Injurious Articles as Nonmailable)

On or about October 2, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

JULIA ANN POFF,

did knowingly, and with the intent to kill and injure another, deposit for mailing and delivery something declared nonmailable by Title 18, United States Code, Section 1716, not in accordance with rules and regulations prescribed by the United States Postal Service, to wit: an explosive and destructive device and compositions which may ignite and explode, addressed to Governor Greg Abbott, 1010 Colorado Street, Austin, Texas 78701.

In violation of Title 18, United States Code, Sections 1716(a), 1716(j)(2) and 2.

COUNT TWO

(Using a Destructive Device During and In Relation to a Crime of Violence)

On or about October 2, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

JULIA ANN POFF,

did knowingly use a firearm, to wit: a destructive device, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, to wit: Injurious Articles as Nonmailable, in violation of Title 18, United States Code Sections 1716(a) and (j)(2), and as alleged in Count One.

In violation of Title 18, United States Code, Sections 924(c)(1)(A), (B)(ii) and (D)(ii).

COUNT THREE

(Injurious Articles as Nonmailable)

On or about October 2, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

JULIA ANN POFF,

did knowingly, and with the intent to kill and injure another, deposit for mailing and delivery something declared nonmailable by Title 18, United States Code, Section 1716, not in accordance with rules and regulations prescribed by the United States Postal Service, to wit: an explosive and destructive device and compositions which may ignite and explode, addressed to President Barack Obama, 1600 Pennsylvania Avenue NW, Washington, D.C. 20500.

In violation of Title 18, United States Code, Sections 1716(a), 1716(j)(2) and 2.

COUNT FOUR

(Using a Destructive Device During and In Relation to a Crime of Violence)

On or about October 2, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

JULIA ANN POFF,

did knowingly use a firearm, to wit: a destructive device, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, to wit: Injurious Articles as Nonmailable, in violation of Title 18, United States Code Sections 1716(a) and (j)(2), and as alleged in Count Three.

In violation of Title 18, United States Code, Sections 924(c)(1)(A), (B)(ii) and (D)(ii).

COUNT FIVE

(Injurious Articles as Nonmailable)

On or about October 2, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

JULIA ANN POFF,

did knowingly, and with the intent to kill and injure another, deposit for mailing and delivery something declared nonmailable by Title 18, United States Code, Section 1716, not in accordance with rules and regulations prescribed by the United States Postal Service, to wit: an explosive and destructive device and compositions which may ignite and explode, addressed to Commissioner Carolyn Colvin, 6401 Security Blvd., Gwynn Oak, MD 21207.

In violation of Title 18, United States Code, Sections 1716(a), 1716(j)(2) and 2.

COUNT SIX

(Using a Destructive Device During and In Relation to a Crime of Violence)

On or about October 2, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

JULIA ANN POFF,

did knowingly use a firearm, to wit: a destructive device, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, to wit: Injurious Articles as Nonmailable, in violation of Title 18, United States Code Sections 1716(a) and (j)(2), and as alleged in Count Five.

In violation of Title 18, United States Code, Sections 924(c)(1)(A), (B)(ii) and (D)(ii).

COUNT SEVEN

(Transportation of Explosives with the Intent to Kill and Injure)

On or about October 2, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

JULIA ANN POFF,

did transport in interstate commerce, an explosive, to wit: a destructive device including smokeless powder, fuses, and pyrotechnic composition, with knowledge and intent that the said explosive would be used to kill, injure and intimidate a person, to wit: President Barack Obama, 1600 Pennsylvania Avenue NW, Washington, D.C. 20500.

In violation of Title 18, United States Code, Sections 844(d) and 2.

COUNT EIGHT

(Using a Destructive Device During and in Relation to a Crime of Violence)

On or about October 2, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

JULIA ANN POFF,

did knowingly use a firearm, to wit: a destructive device, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, to wit: Transportation of Explosives with the Intent to Kill and Injure, in violation of Title 18, United States Code, Sections 844(d), and as alleged in Count Seven.

In violation of Title 18, United States Code, Sections 924(c)(1)(A), (B)(ii) and (D)(ii).

COUNT NINE

(Transportation of Explosives with the Intent to Kill and Injure)

On or about October 2, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

JULIA ANN POFF,

did transport in interstate commerce, an explosive, to wit: a destructive device including smokeless powder, fuses, and pyrotechnic composition, with knowledge and intent that the said explosive would be used to kill, injure and intimidate a person, to wit: Commissioner Carolyn Colvin, 6401 Security Blvd., Gwynn Oak, MD 21207.

In violation of Title 18, United States Code, Sections 844(d) and 2.

COUNT TEN

(Using a Destructive Device During or in Relation to a Crime of Violence)

On or about October 2, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

JULIA ANN POFF,

did knowingly use a firearm, to wit: a destructive device, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, to wit: Transportation of Explosives with the Intent to Kill and Injure, in violation of Title 18, United States Code, Sections 844(d), and as alleged in Count Nine.

In violation of Title 18, United States Code, Sections 924(c)(1)(A), (B)(ii) and (D)(ii).

COUNT ELEVEN

(Supplemental Nutrition Assistance Program Fraud)

Between on or about September 7, 2012, and on or about January 30, 2015, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

JULIA ANN POFF,

did knowingly use, transfer, acquire and possess electronic benefit transfer (EBT) authorization cards and access devices of a value of \$5,000.00 or more, in a manner not authorized by Chapter 51 of Title 7, United States Code, to wit: Julia Ann Poff fraudulently applied for and received Supplemental Nutrition Assistance Program (SNAP) benefits (formerly known as the Food Stamp Program).

In violation of Title 7, United States Code, Section 2024(b) and Title 18, United States Code, Section 2.

COUNT TWELVE
(False Declaration in Bankruptcy)

Between on or about September 20, 2012, and on or about July 2, 2015, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

JULIA ANN POFF and
WILLIAM HARVEY POFF,

in connection with a case under Title 11 of the United States Code, specifically, Southern District of Texas Bankruptcy Case Number 12-37006, William Harvey Poff and Julia Ann Poff, Debtors, did knowingly and fraudulently make a declaration and statement under penalty of perjury as permitted under section 1746 of Title 28, in and in relation to the above case under Title 11, that is, the defendants, Julia Ann Poff and William Harvey Poff, submitted schedules containing fraudulent information relating to income and expenses thereby affecting the discharge of debt and each defendant unlawfully availed herself/himself of the benefits of the automatic bankruptcy stay.

In violation of Title 18, United States Code, Sections 152(3) and 2.

COUNT THIRTEEN
(False Declaration in Bankruptcy)

Between on or about May 24, 2016, and on or about September 3, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

JULIA ANN POFF and
WILLIAM HARVEY POFF,

in connection with a case under Title 11 of the United States Code, specifically, Southern District of Texas Bankruptcy Case Number 16-32606, William Harvey Poff and Julia Ann Poff, Debtors, did knowingly and fraudulently make a declaration and statement under penalty of perjury as permitted under section 1746 of Title 28, in and in relation to the above case under Title 11, that

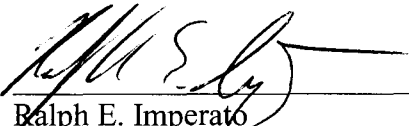
is, the defendants, Julia Ann Poff and William Harvey Poff, submitted schedules containing fraudulent information relating to income and expenses thereby affecting the discharge of debt and each defendant unlawfully availed herself/himself of the benefits of the automatic bankruptcy stay.


In violation of Title 18, United States Code, Sections 152(3) and 2.

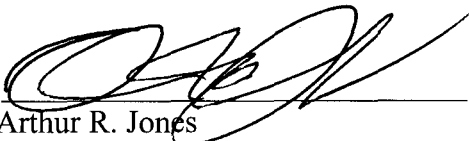
A TRUE BILL

ORIGINAL SIGNATURE ON FILE
~~FOREPERSON~~ OF THE GRAND JURY

RYAN K. PATRICK
United States Attorney
Southern District of Texas

By: 
Ralph E. Imperato
Assistant United States Attorney

By: 
Alamdard Hamdani
Assistant United States Attorney

By: 
Arthur R. Jones
Assistant United States Attorney